

FILED

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN  
DISTRICT OF OHIO

10 DEC - 6 PM 4:09

CLEVELAND U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

4 :10 CV 2769  
JUDGE BOWD  
Complaint  
Plaintiff Demands Trial  
by Jury

Robert S. Roop  
Gerald E. Uhl  
Richard Singleton

Plaintiffs

Against

Walmart Corporation

MAG. JUDGE PEARSON

Defendant

At all times hereinafter mentioned, Plaintiff was and still is a resident of the state of Ohio.

Defendant Wal-Mart, is a corporation, incorporated under the laws of the United States and having a main office at

702 SW 8th Street  
Bentonville, Arkansas 72716-8611

The Jurisdiction of this court is invoked pursuant to violation of 21 U.S.C § 830 and 21 U.S.C. § 844a restrictions on sales quantity scheduled listed chemicals requirements regarding nonliquid forms containing ephedrine, pseudoephedrine, phenylpropanolamine based products.

Wal-Mart did not provide enough safeguards to monitor how much pseudoephedrine people were purchasing and violated federal drug regulations 21 U.S.C. § 830 and 21 U.S.C. § 844a.

Wal-Mart knew it had a duty to prevent methamphetamine trafficking, but failed to take steps to control the sale of a regulated drug used by methamphetamine cooks.

As a result, Ohio saw an increase in methamphetamine production in Summit, and many other counties. So called "smurfers" were able to travel from Wal-Mart to Wal-Mart and purchase pseudoephedrine at multiple store locations in a single day. It is a fact that Wal-Mart knew exactly what they were doing was wrong, but chose to ignore federal laws and the damage that meth sales and production were having on society, in exchange for millions of dollars in profits.

Wal-Mart has always claimed to be a family oriented store. Their motto "Live Better" is a farce because Wal-Mart has been a one-stop store for meth manufacturers since they have been open. By being open 24 hours a day, having many locations in each state, selling many items and chemicals needed to manufacture meth, paying little or no attention to federal regulations of such items. Regulations like "Combat methamphetamine epidemic act 2005", Title VII of public law 109-177 put in place by the Drug Enforcement Administration.

Just because Wal-Mart is a large corporation does not mean that they can ignore federal laws and be one of the biggest enablers of something that is destroying society at such an alarming rate. Methamphetamine is like no other drug epidemic ever seen. There are countless numbers of people in prison. So many children of meth users being raised by grandparents while their real parents are either spun out on meth or serving prison time. The ramifications of these actions are only going to keep tearing at the moral fabric for generations while stores like Wal-Mart have no concern for this as long as they are making a profit.

Wherefore: Plaintiff demands:

Money damages in the amount of \$20,000,000.00 Twenty million dollars.

Also: Permanent injunction against the defendant from performing such acts in the future.

Any further relief which the court may deem appropriate.

  
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